

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**ROWVAUGHN WELLS, Individually
and as Administratrix Ad Litem of the
Estate of Tyree Deandre Nichols, deceased,**

Plaintiff,

VS.

2:23-cv-02224-MSN-atc

**CITY OF MEMPHIS, a municipality,
CHIEF CERELYN DAVIS in her
official capacity,
EMITT MARTIN III in his individual capacity,
DEMETRIUS HALEY in his individual capacity,
JUSTIN SMITH in his individual capacity,
DESMOND MILLS, Jr. in his individual capacity,
TADARRIUS BEAN in his individual capacity,
PRESTON HEMPHILL in his individual capacity,
ROBERT LONG in his individual capacity,
JAMICHAEL SANDRIDGE in his individual capacity,
MICHELLE WHITAKER in her individual capacity, and
DEWAYNE SMITH in his individual capacity and as
an agent of the City of Memphis,**

Defendants.

INITIAL DISCLOSURES OF DEFENDANT DEMETRIUS HALEY, INDIVIDUALLY

COMES NOW, Defendant Demetrius Haley, individually through Counsel, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, and makes the following disclosures:

A. Individuals likely to have discoverable information that Defendant may use to support his defenses (except as exempted by Rule 26(a)(1)(B) or as otherwise stipulated or ordered by the court):

At this time Defendant incorporates by reference the persons identified in the Rule 26(a)(1) disclosures of Defendant City of Memphis as if stated herein verbatim, and also specifically identifies the following, all of whom are represented by counsel and may be contacted through their counsel of record.

RowVaughn Wells, Plaintiff: Knowledge of the claims and defenses in this lawsuit

Rodney Wells, Plaintiff's spouse: Knowledge of the claims and defenses in this lawsuit

Chief Cerelyn Davis, Defendant: Chief of Memphis Police Dept. (MPD); Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Emmit Martin III, Defendant: Eyewitness to events giving rise to this lawsuit

Desmond Mills, Jr., Defendant: Eyewitness to events giving rise to this lawsuit

Justin Smith, Defendant: Eyewitness to events giving rise to this lawsuit

Demetrius Haley, Defendant: Eyewitness to events giving rise to this lawsuit

Tadarrius Bean, Defendant: Eyewitness to events giving rise to this lawsuit

Preston Hemphill, Defendant: Eyewitness to events giving rise to this lawsuit

Dewayne M. Smith, Defendant: Eyewitness to events giving rise to this lawsuit

Robert Long: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

JaMichael Sandridge: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Michelle Whitaker: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Deputy Chief Michael Hardy: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

The following witnesses may be contacted through Counsel for the City of Memphis:

Officer Jamil Matthews Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Officer Wann Read Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Officer Victor Lester, Jr.: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Lt. Dotson: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Lt. Brandon Harris: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Lt. Andrew Kosso: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Lt. Israel Taylor: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Officer Valandria McKinnie: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Major Christopher Mohny: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Col. Willie Mathena: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Lt. Robert Wilke: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Sgt. Young: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Officer Samuel Lively: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Officer Irma Montes: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Officer Daniel Boyce: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Col. Dennis McNeil: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Sgt. C. Paige: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Sgt. R. Mear: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Sgt. Craig: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Officer Darrell Mathis: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

Officer Marcus Redd: Knowledge of MPD's policies, training, Scorpion Unit, incident

giving rise to this lawsuit

Lt. Essica Cage-Rosario: Knowledge of MPD's policies, training, Scorpion Unit, incident giving rise to this lawsuit

The following witness may be contacted through Shelby County Attorney's Office:

Shelby County Deputy Jeremy Watkins: Knowledge of law enforcement policies and training and the incident giving rise to this lawsuit

Demetrius Haley incorporates by reference and further discloses any persons who may have discoverable information that any party may identify in this lawsuit including but not limited to additional law enforcement personnel, civilian personnel employed by City of Memphis, medical professionals, healthcare workers, forensic professionals, custodians of records, etc., and reserves all rights to supplement and amend these disclosures as discovery continues in this matter until conclusion of the case.

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses:

Demetrius Haley will supply this information when the criminal proceedings against him are resolved per Order of the Court (R. 110).

C. Compilation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34, the documents or other evidentiary material, not privileged or protected from disclosure, on which such compilation is based, including materials bearing on the nature of injuries suffered:

Not applicable.

D. For inspection and copying as under Rule 34, any insurance agreement under which any person carrying on an insurance business which may be liable to satisfy all or part of a judgment, which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment in this case:

Demetrius Haley is not aware of any such agreement.

Respectfully submitted,
LAW OFFICE OF STEPHEN R.
LEFFLER, P.C.

s/Stephen R. Leffler #11038
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